

1 Honorable Benjamin H. Settle  
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7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON  
9 AT TACOMA

10 NORTHWEST SCHOOL OF SAFETY, a  
11 Washington sole proprietorship, PUGET  
12 SOUND SECURITY, INC., a Washington  
13 corporation, PACIFICA NORTHWEST  
14 ASSOCIATION OF INVESTIGATORS, INC.,  
15 a Washington corporation, FIREARMS  
16 ACADEMY OF SEATTLE, INC., a  
17 Washington corporation, DARRYL LEE, XEE  
18 DEL REAL, JOE WALDRON, GENE  
19 HOFFMAN, ANDREW GOTTLIEB, ALAN  
20 GOTTLIEB, GOTTLIEB FAMILY  
21 REVOCABLE LIVING TRUST, a Washington  
22 trust, and SECOND AMENDMENT  
23 FOUNDATION, a non-profit organization,

24 Plaintiffs,

25 v.

26 BOB FERGUSON, Attorney General of  
Washington (in his official capacity),  
WASHINGTON ATTORNEY GENERAL'S  
OFFICE, and JOHN R. BATISTE, Chief of the  
Washington State Patrol (in his official  
capacity), and DOES I-V,

Defendants.

No. 3:14-cv-6026 BHS

DECLARATION OF ZACH SILK IN  
SUPPORT OF CHERYL STUMBO,  
WASHINGTON ALLIANCE FOR GUN  
RESPONSIBILITY, AND  
EVERYTOWN FOR GUN SAFETY  
ACTION FUND FOR I-594'S MOTION  
TO INTERVENE

DECLARATION OF ZACH SILK IN SUPPORT OF STUMBO,  
WAGR, AND EVERYTOWN'S MOTION TO INTERVENE - 1  
Case No. 3:14-cv-6026 BHS

20085 00004 eb135e074v.003

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1 I, ZACH SILK, declare as follows:

2 1. I am over the age of 18, am competent to testify, and offer this declaration based  
3 on my personal knowledge.

4 2. I was the Campaign Manager of the Washington Alliance for Gun Responsibility  
5 (“WAGR”). WAGR is a 501(c)(4) nonprofit organization formed in January 2013 and  
6 headquartered in Seattle, Washington. WAGR is a coalition of citizens and organizations  
7 working together to find solutions to reduce gun violence.

8 3. WAGR was the driving force behind Initiative 594 (“I-594” or “Initiative”),  
9 which closed the background check loophole for sales and transfers of guns in Washington State.

10 4. One of WAGR’s organizational goals is to keep guns out of the hands of  
11 individuals legally prohibited from possessing them, including felons and persons courts have  
12 determined are dangerously mentally ill. In its work on I-594, WAGR focused on closing the  
13 background check loophole to further this organizational goal.

14 5. In early 2013, WAGR drafted I-594 as an initiative to the Washington State  
15 Legislature.

16 6. On June 11, 2013, WAGR filed I-594 with the Washington Secretary of State.  
17 Cheryl Stumbo served as the official Citizen-Sponsor of the Initiative.

18 7. On July 1, 2013, WAGR and Ms. Stumbo filed an appeal of the Washington  
19 Attorney General’s proposed ballot title for I-594. WAGR and Ms. Stumbo did not believe the  
20 proposed title met their intent in drafting the Initiative. WAGR and Ms. Stumbo briefed the  
21 issue and presented oral argument to the trial court.

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1       8. After the trial court issued the final ballot title, WAGR circulated petitions and  
 2 gathered sufficient citizen signatures to qualify I-594 for presentation to the Washington State  
 3 Legislature, and ultimately to the people for a vote. WAGR submitted 346,834 signatures, well  
 4 in excess of the number required. *See* [http://www.sos.wa.gov/\\_assets/elections/initiatives/Top25.pdf](http://www.sos.wa.gov/_assets/elections/initiatives/Top25.pdf) (last visited Feb. 20, 2015).

5       9. WAGR worked with Ms. Stumbo and Everytown for Gun Safety Action Fund for  
 6 I-594 (“Everytown for I-594”) during the 2014 legislative session to have the Legislature  
 7 approve I-594. To that end, WAGR presented testimony to the Legislature on the importance of  
 8 closing the background check loophole.

9       10. When the Legislature did not act on I-594, the Initiative was placed on the  
 10 November 4, 2014 general election ballot. WAGR registered with the Washington State Public  
 11 Disclosure Commission as the primary I-594 ballot committee.

12       11. WAGR worked closely with Ms. Stumbo, Everytown for I-594 and its partners in  
 13 spearheading the campaign to pass I-594. WAGR was the primary campaign committee working  
 14 in support of I-594. WAGR’s campaign activities included significant fundraising, get-out-the-  
 15 vote efforts, speaking at public events, debates, and media interaction. WAGR engaged  
 16 thousands of Washingtonians in meaningful volunteer work, including making tens of thousands  
 17 of phone calls and thousands of door visits to Washington voters across the state. WAGR also  
 18 directly communicated with Washington voters through direct mail, digital and television  
 19 advertising making the case for I-594. WAGR and its representatives were also the primary  
 20 agent arguing for I-594 in the media, at forums and at editorial board interviews.

21       I declare under penalty of perjury of the laws of the State of Washington that the  
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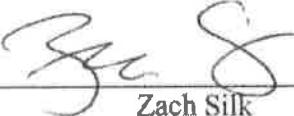
24       DECLARATION OF ZACH SILK IN SUPPORT OF STUMBO,  
 25       WAGR, AND EVERYTOWN’S MOTION TO INTERVENE - 3  
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1 foregoing is true and correct.

2 DATED this 20 day of February, 2015, signed in SEATTLE, Washington.

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Zach Silk

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DECLARATION OF ZACH SILK IN SUPPORT OF STUMBO,  
WAGR, AND EVERYTOWN'S MOTION TO INTERVENE - 4  
Case No. 3:14-cv-6026 BHS

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 23rd day of February, 2015, I electronically filed the foregoing document with the United States District Court ECF system, which will send notification of such filing to the following:

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*Attorneys for Defendants*

Signed at Seattle, Washington this 23rd day of February, 2015.

Dawn M. Taylor

DECLARATION OF ZACH SILK IN SUPPORT OF STUMBO,  
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